UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

ROCCO CIOFOLETTI, et al., on behalf	§	
of themselves and all others similarly	§	
situated,	§	
Plaintiffs,	§	
v.	§	CASE NO. 0:18-CV-03025-JNE-ECW
	§	
SECURIAN FINANCIAL GROUP, INC., et al.,	§	
	§	
	§	
Defendants.	§	
	8	

SHURWEST, LLC'S NOTICE OF MOTION TO EXTEND TIME

TO: Plaintiffs, through their counsel Lee Squitieri, SQUITIERI & FEARON, LLP, 32 East 57th Street, 12th Floor, New York, New York 10022; Daniel E. Gustafson, Karla M. Gluek, Daniel J. Nordin, GUSTAFSON GLUEK PLLC, Canadian Pacific Plaza, 120 South Sixth Street, Suite 2600, Minneapolis, MN 55402; and Kenneth A. Wexler, Kara A. Elgersma, WEXLER WALLACE LLP, 55 W. Monroe Street, Suite 3300, Chicago, Illinois 60603.

PLEASE TAKE NOTICE that Shurwest LLC will move the Court, either without a hearing or with a telephonic hearing at the Court's earliest availability, for an extension of time to file its motion to dismiss Plaintiffs' complaint as a result of the effects of the COVID-19 pandemic.

[signature page follows]

Dated: March 23, 2020 ANTHONY OSTLUND BAER & LOUWAGIE P.A.

Brooke D. Anthony (#0387559) Philip J. Kaplan (#0389351) 3600 Wells Fargo Center 90 South Seventh Street Minneapolis, Minnesota 55402

Tel: (612) 349-6969 Fax: (612) 349-6996

Email: banthony@anthonyostlund.com pkaplan@anthonyostlund.com

and

DLA PIPER LLP (US)

s/ Jason M. Hopkins

Jason S. Lewis (Texas No. 24007551 pro hac vice) Jason M. Hopkins (Texas No. 24059969 pro hac vice) 1900 N. Pearl St., Ste. 2200

Dallas, Texas 75201 Tel: (214) 743-4546 Fax: (972) 813-6267

Email: Jason.Lewis@dlapiper.com Jason.Hopkins@dlapiper.com

Attorneys for Defendant Shurwest, LLC

CERTIFICATE OF SERVICE

I certify that on March 23, 2020, I served the foregoing motion on all counsel of record via the Court's CM/ECF system.

/s/ Jason M. Hopkins Jason M. Hopkins